

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

SARAH BUNTURA,
Plaintiff,

v.

FORD MOTOR COMPANY,
JUDGE J. PHILIP CALABRESE ^{OFFICIAL} ~~██████████~~ Capacity),
Defendants.

Case No: _____

FILED

JUL 08 2025

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

1:25 CV 01429
JUDGE BARKER

MAG. JUDGE SHEPERD

COMPLAINT FOR VIOLATIONS OF CIVIL RIGHTS UNDER 42 U.S.C. § 1983

Plaintiff Sarah Buntura files this Complaint to address serious constitutional and statutory violations involving judicial misconduct and misuse of judicial records to defeat her employment rights and access to justice.

Plaintiff brings this action under 42 U.S.C. § 1983 and related statutes.

Plaintiff reserves the right to supplement this Complaint with the outcome of her Motion to Recuse, which remains pending. If the motion is denied, Plaintiff will incorporate that denial as further evidence of judicial retaliation and procedural misconduct.

I. JURISDICTION AND VENUE

1. This Court has jurisdiction pursuant to 28 U.S.C. § 1331 (federal question) and 28 U.S.C. § 1343 (civil rights).
2. Venue is proper under 28 U.S.C. § 1391(b), as all relevant events occurred in this District.

II. PARTIES

3. Plaintiff Sarah Buntura resides in Brunswick, Ohio.
4. Defendant Ford Motor Company is a private employer doing business in Ohio.
5. Defendant Judge J. Philip Calabrese is a federal district judge in the Northern District of Ohio. He is sued in his individual capacity for nonjudicial acts that violated Plaintiff's rights.

Receipt # 159158 8405-20 7/8/2025 Court

III. FACTUAL BACKGROUND

6. In July 2024, Plaintiff filed Case No. 1:24-cv-01313, alleging that Ford violated the Fair Credit Reporting Act (FCRA) by taking adverse employment action without first issuing the required pre-adverse action notice, report copy, and summary of rights under 15 U.S.C. § 1681b(b)(3).
7. The Court dismissed the case sua sponte before service, under 28 U.S.C. § 1915(e), failing to evaluate the FCRA claims.
8. A Motion to Amend was denied contrary to the liberal Rule 15 standard.
9. Plaintiff filed a second complaint (1:24-cv-01811) with additional facts. That case was dismissed based on res judicata, despite a prior ruling that FCRA claims were not adequately pled.
10. Ford was never served in either federal case. Nonetheless, Ford submitted those court orders to the Ohio Civil Rights Commission (OCRC), claiming vindication and urging dismissal of Plaintiff's administrative charge. The OCRC dismissed the charge.
11. Plaintiff did not learn of Ford's misuse of the rulings until May 2025, after obtaining OCRC documents via public records request.
12. On June 27, 2025, Plaintiff filed a Rule 60(b)(2) motion in the first case based on newly discovered evidence of Ford's fraudulent use of court orders in administrative proceedings. After realizing certain supporting documents had been inadvertently omitted, Plaintiff returned to the courthouse first thing Monday morning, June 30, 2025, and filed additional exhibits corroborating the fraud claim.
13. The Clerk confirmed that both filings—June 27 and June 30—would be docketed by the end of the day. However, that same day, the Court issued a denial of the Rule 60(b) motion and a written warning threatening sanctions, without having reviewed the newly submitted evidence.
14. Plaintiff filed a Motion to Recuse Judge Calabrese on July 7, 2025, which remains pending.

IV. LEGAL CLAIMS

COUNT I: VIOLATION OF FIFTH AMENDMENT DUE PROCESS

(Against Judge Calabrese – Individual Capacity)

15. Defendant Calabrese denied Plaintiff her right to due process by dismissing her case before service, revoking IFP status without notice, and refusing to consider newly submitted material evidence.

COUNT II: ABUSE OF JUDICIAL AUTHORITY / RETALIATORY CONDUCT

(Against Judge Calabrese – Individual Capacity)

16. The denial of Plaintiff's Rule 60(b)(2) motion within hours of filing, without review, and the issuance of a written threat constitutes punitive retaliation outside the bounds of legitimate judicial decision-making.

COUNT III: DUE PROCESS VIOLATION – USE OF FRAUDULENT EVIDENCE

(Against Ford Motor Company)

17. Ford knowingly submitted federal court rulings—from cases in which it had not appeared or been served—to a state agency to influence an outcome against Plaintiff.
18. These actions denied Plaintiff a fair opportunity to pursue state remedies and constitute a deprivation of her rights under color of law.

COUNT IV: VIOLATION OF FAIR CREDIT REPORTING ACT

(Against Ford Motor Company)


19. Ford failed to issue a pre-adverse action notice, a copy of the background report, and a summary of rights before rescinding Plaintiff's job offer, in violation of 15 U.S.C. § 1681b(b)(3).
20. These omissions were willful or, at minimum, negligent under 15 U.S.C. §§ 1681n and 1681o.

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Declare that Defendants violated Plaintiff's constitutional and statutory rights;
- B. Award compensatory and punitive damages;
- C. Enjoin future misconduct and abuse of judicial authority;
- D. Grant reasonable attorney's fees under 42 U.S.C. § 1988;
- E. Reopen Plaintiff's previously dismissed federal case (1:24-cv-01313) pursuant to the findings of this action and in the interest of justice;
- F. Vacate the sua sponte dismissal order and denial of Plaintiff's Rule 60(b) motion in Case No. 1:24-cv-01313 as constitutionally deficient and procedurally improper;
- G. Direct the Clerk of Court to restore Plaintiff's in forma pauperis (IFP) status retroactively, with all rights to appeal preserved;
- H. Refer Defendant Ford Motor Company's conduct to the appropriate federal agencies (including the FTC and EEOC) for further investigation and enforcement of FCRA and labor violations;
- I. Grant all further relief the Court deems just and proper.

Dated: July 8, 2025



Respectfully submitted,

Sarah Buntura

4390 Southwick Blvd

Brunswick, OH 44212

(216) 352-8569

sarahbuntura@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on **July 8, 2025**, I served a true and correct copy of the **Complaint under 42 U.S.C. § 1983** upon the following individuals:

Ford Motor Company

c/o C T Corporation System
4400 Easton Commons Way, Suite 125
Columbus, OH 43219

Randy Enochs

Ford Motor Company
1 American Road
Dearborn, MI 48126

Service was made via **U.S. Mail**.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sarah Buntura", written in a cursive style.

Sarah Buntura

4390 Southwick Blvd
Brunswick, OH 44212